

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

LULAC Texas, *et al.*,

*Plaintiffs,*

v.

Jose Esparza, *et al.*,

*Defendants.*

No. 1:21-cv-00786-XR

Consolidated with *La Unión del Pueblo  
Entero v. Abbott*, No. 5:21-cv-844

**HARRIS COUNTY REPUBLICAN PARTY, DALLAS COUNTY REPUBLICAN PARTY,  
NATIONAL REPUBLICAN SENATORIAL COMMITTEE, AND NATIONAL  
REPUBLICAN CONGRESSIONAL COMMITTEE’S [PROPOSED] ANSWER**

Intervenor-Defendants Harris County Republican Party, Dallas County Republican Party, National Republican Senatorial Committee, and National Republican Congressional Committee (the “Republican Committees”) respectfully answer Plaintiffs’ Complaint. Any allegation in the Complaint not explicitly responded to in this Answer is hereby denied.

**INTRODUCTION**

1. The Republican Committees deny that Texas officials are engaged in an “ongoing campaign” to “limit access to the franchise.” The Republican Committees are without knowledge or information sufficient to form a belief as to the remaining allegations in Paragraph 1 and so deny them.

2. The Republican Committees deny that Texas officials “took affirmative steps to make voting harder” in the 2020 election and that “the State did almost nothing to facilitate access to the ballot box.” The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 2 and so deny them.

3. Voter turnout data speaks for itself and does not require a response. The Republican Committees deny that “extraordinary obstacles” were imposed on voters or election workers or that voters had to “navigate restrictive election administration procedures.” The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 3 and so deny them.

4. The Republican Committees deny that “state officials attempted to obstruct” voter access. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 4 and so deny them.

5. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 5 and so deny them.

6. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 6 and so deny them.

7. The Republican Committees deny the allegations in Paragraph 7.

8. The Republican Committees deny that Senate Bill (“SB”) 7 constituted a “voter suppression bill.” Legislative history speaks for itself and does not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 8 and so deny them.

9. The Republican Committees deny that SB 1 constitutes “voter suppression legislation.” Legislative history speaks for itself and does not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 9 and so deny them.

10. The Republican Committees deny that SB 1 is “unlawful,” constitutes “voter suppression” legislation, “burdens voters,” or that its provisions are “[s]uppressive.” The statute and legislative history speak for themselves and do not require a response, nor do Paragraph 10’s legal conclusions and/or statements of what the law provides or should provide. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 10 and so deny them.

11. The Republican Committees deny the allegations in Paragraph 11.

12. The Republican Committees deny the allegations in Paragraph 12.

13. The Republican Committees deny that Plaintiffs are entitled to relief.

#### **JURISDICTION AND VENUE**

14. Paragraph 14 states legal conclusions that do not require a response. To the extent a response is required, the Republican Committees deny the allegations in Paragraph 14.

15. Paragraph 15 states legal conclusions that do not require a response. To the extent a response is required, the Republican Committees deny the allegations in Paragraph 15.

16. Paragraph 16 states legal conclusions that do not require a response. To the extent a response is required, the Republican Committees deny the allegations in Paragraph 16.

17. Paragraph 17 states a legal conclusion that does not require a response. To the extent a response is required, the Republican Committees do not contest venue; and, except as expressly admitted, the Republican Committees deny any remaining allegations in Paragraph 17.

18. Paragraph 18 states legal conclusions that do not require a response. To the extent a response is required, the Republican Committees deny the allegations in Paragraph 18.

## **PARTIES**

19. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 19 and so deny them.

20. The Republican Committees deny that SB 1 “erects new barriers to voting that impose significant burdens” on voters. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 20 and so deny them. Paragraph 20 otherwise states legal conclusions and/or statements of what the law provides or should provide, to which no response is required; to the extent a response is required, these allegations are denied.

21. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 21 and so deny them.

22. The Republican Committees deny that SB 1 “impede[s] access to the franchise” or imposes any harms on Plaintiff or its constituency. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 22 and so deny them. Paragraph 22 otherwise states legal conclusions and/or statements of what the law provides or should provide, to which no response is required; to the extent a response is required, these allegations are denied.

23. The Republican Committees deny that the challenged provisions of SB 1 “threaten to deprive” anyone of “the right to vote and have their votes counted.” The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 23 and so deny them. Paragraph 23 otherwise states legal conclusions and/or statements of what the law provides or should provide, to which no response is required; to the extent a response is required, these allegations are denied.

24. The Republican Committees deny that SB 1 “burden[s] or denie[s]” the right to vote. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 24 and so deny them. Paragraph 24 otherwise states legal conclusions and/or statements of what the law provides or should provide, to which no response is required; to the extent a response is required, these allegations are denied.

25. The Republican Committees deny that the challenged provisions of SB 1 “burden” the right to vote or place anyone at “risk of disenfranchisement.” The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 25 and so deny them. Paragraph 25 otherwise states legal conclusions and/or statements of what the law provides or should provide, to which no response is required; to the extent a response is required, these allegations are denied.

26. The Republican Committees admit that Defendant Esparza is the Deputy Secretary of State of Texas and that Plaintiffs purport to sue him in his official capacity. Paragraph 26 otherwise states legal conclusions and/or statements of what the law provides or should provide, to which no response is required; to the extent a response is required, these allegations are denied.

27. The Republican Committees admit that Defendant Paxton is the Attorney General of Texas and that Plaintiffs purport to sue him in his official capacity. Paragraph 27 otherwise states legal conclusions and/or statements of what the law provides or should provide, to which no response is required; to the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 27 and so deny them.

28. The Republican Committees admit that Defendant Callanen is the Bexar County Elections Administrator and that Plaintiffs purport to sue her in her official capacity. The

Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 28 and so deny them.

29. The Republican Committees admit that Defendant DeBeauvoir is the Travis County Clerk and that Plaintiffs purport to sue her in her official capacity. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 29 and so deny them.

30. The Republican Committees admit that Defendant Longoria is the Harris County Elections Administrator and that Plaintiffs purport to sue her in her official capacity. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 30 and so deny them.

31. The Republican Committees admit that Defendant Ramón is the Hidalgo County Elections Administrator and that Plaintiffs purport to sue her in her official capacity. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 31 and so deny them.

32. The Republican Committees admit that Defendant Scarpello is the Dallas County Elections Administrator and that Plaintiffs purport to sue him in his official capacity. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 32 and so deny them.

33. The Republican Committees admit that Defendant Wise is the El Paso County Elections Administrator and that Plaintiffs purport to sue her in her official capacity. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 33 and so deny them.

## STATEMENT OF FACTS AND LAW

34. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 34 and so deny them. The Republican Committees specifically deny that Texas voting laws are “restrictive.”

35. Voter turnout data speaks for itself and does not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 35 and so deny them. The Republican Committees specifically deny that Texas voting laws impose “obstacles” on voters.

36. Demographic data speaks for itself and does not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 36 and so deny them.

37. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 37 and so deny them.

38. Election results speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 38 and so deny them.

39. Election results speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 39 and so deny them.

40. Election results speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 40 and so deny them.

41. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 41 and so deny them.

42. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 42 and so deny them.

43. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 43 and so deny them.

44. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 44 and so deny them.

45. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 45 and so deny them.

46. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 46 and so deny them.

47. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 47 and so deny them.

48. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 48 and so deny them.

49. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 49 and so deny them.



50. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 50 and so deny them.

51. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 51 and so deny them.

52. Demographic data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 52 and so deny them.

53. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 53 and so deny them.

54. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 54 and so deny them.

55. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 55 and so deny them.

56. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 56 and so deny them.

57. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 57 and so deny them.

58. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 58 and so deny them.

59. Exit poll data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 59 and so deny them.

60. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 60 and so deny them.

61. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 61 and so deny them.

62. The Republican Committees deny the allegations in Paragraph 62.

63. Governor Abbott's proclamation speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 63 and so deny them.

64. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 64 and so deny them.

65. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 65 and so deny them.

66. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 66 and so deny them.

67. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 67 and so deny them.

68. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 68 and so deny them.

69. The Republican Committees deny that Republican officials or party leaders engaged in “suppressive actions.” The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford v. Marion Cnty. Election Bd.*, 553 U.S. 181, 196 (2008). The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 69 and so deny them.

70. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 70 and so deny them.

71. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 71 and so deny them.

72. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,”

voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 72 and so deny them.

73. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 73 and so deny them.

74. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 74 and so deny them.

75. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 75 and so deny them.

76. The Republican Committees deny the allegations in Paragraph 76.

77. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 77 and so deny them.

78. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 78 and so deny them.

79. Statements made in legal briefs speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 79 and so deny them.

80. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 80 and so deny them.

81. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 81 and so deny them.

82. The Republican Committees deny the allegations in Paragraph 82.

83. Statements made in legal briefs speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 83 and so deny them.

84. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 84 and so deny them.

85. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 85 and so deny them.

86. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 86 and so deny them.

87. The Republican Committees deny that Texas's Republican leaders sought to pass legislation "that targeted mechanisms disproportionately used by Texas's minority voters." The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 87 and so deny them.

88. The Republican Committees deny that SB 7 would have had "suppressive effects" or that the legislature lacked "legitimate justification for enacting it." Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 88 and so deny them.

89. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees specifically deny that SB 7 contained "anti-voting provisions from voter suppression bills."

90. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 90 and so deny them.

91. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 91 and so deny them.

92. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 92 and so deny them.

93. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 93 and so deny them.

94. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 94 and so deny them.

95. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 95 and so deny them.

96. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 96 and so deny them.

97. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 97 and so deny them.

98. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 98 and so deny them.

99. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 99 and so deny them.

100. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 100 and so deny them.

101. The Republican Committees deny that House Bill (“HB”) 6 would have had “suppressive effects.” Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 101 and so deny them.

102. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 102 and so deny them.

103. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 103 and so deny them.

104. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 104 and so deny them.

105. The Republican Committees deny that HB 6 would have had a “harmful, discriminatory impact” or that SB 7 would have placed “burdens” on any voters. Legislative history speaks for itself and does not require a response. To the extent a response is required, the



Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 105 and so deny them.

106. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 106 and so deny them.

107. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 107 and so deny them.

108. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 108 and so deny them.

109. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 109 and so deny them.

110. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 110 and so deny them.

111. The Republican Committees deny that SB 7 had “racist roots.” Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 111 and so deny them.

112. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history but deny that this history is relevant to SB 1 or that SB 1 was motivated

by racial discrimination. Legislative history and provisions of the Texas Constitution speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 112 and so deny them.

113. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 113 and so deny them.

114. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 114 and so deny them.

115. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 115 and so deny them.

116. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 116 and so deny them.

117. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 117 and so deny them.

118. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 118 and so deny them.

119. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 119 and so deny them.

120. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 120 and so deny them.

121. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 121 and so deny them.

122. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 122 and so deny them.

123. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 123 and so deny them.

124. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 124 and so deny them.

125. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 125 and so deny them.

126. The Republican Committees deny the allegations in Paragraph 126.

127. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 127 and so deny them.

128. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 128 and so deny them.

129. The Republican Committees deny the allegations in Paragraph 129.

130. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 130 and so deny them.

131. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 131 and so deny them.

132. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 132 and so deny them.

133. The Republican Committees deny that SB 1 “suppress[es] the right to vote.” Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 133 and so deny them.

134. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 134 and so deny them.

135. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 135 and so deny them.

136. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 136 and so deny them.

137. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 137 and so deny them.

138. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 138 and so deny them.

139. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 139 and so deny them.

140. The Republican Committees deny the allegations in Paragraph 140.

141. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 141 and so deny them.

142. The Republican Committees deny that the bills were “voter suppression bills.” Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 142 and so deny them.

143. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 143 and so deny them.

144. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees deny the goal of the special legislative session was passage of “restrictive voter suppression legislation.”

145. The Republican Committees deny that SB 1 has “disenfranchising effects.” Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 145 and so deny them.

146. The Republican Committees deny that “SB 1 is designed to—and, if enforced, will—burden the franchise for lawful voters.” Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 146 and so deny them.

147. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 147 and so deny them.

148. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 148 and so deny them.

149. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 149 and so deny them.

150. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 150 and so deny them.

151. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 151 and so deny them.

152. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 152 and so deny them.

153. The Republican Committees admit that Governor Abbott signed SB 1 into law on September 7, 2021.

154. The Republican Committees specifically deny that the referenced provisions of SB 1 set forth in Paragraph 154 are “[s]uppressive.” The statute speaks for itself and does not require a response. Paragraph 154, moreover, states legal conclusions and/or statements of what the law provides or should provide, to which no response is required; to the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 154 and so deny them.

155. The statute speaks for itself and does not require a response. Paragraph 155 states legal conclusions and/or statements of what the law provides or should provide, to which no

response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 155 and so deny them.

156. The statute speaks for itself and does not require a response. Paragraph 156 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

157. The statute speaks for itself and does not require a response. Paragraph 157 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

158. The statute speaks for itself and does not require a response. Paragraph 158 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees specifically deny that SB 1 “burdens” absentee voters.

159. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 159 and so deny them.

160. The statute speaks for itself and does not require a response. Paragraph 160 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 160 and so deny them.

161. Paragraph 161 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these



allegations are denied. The Republican Committees specifically deny that SB 1 “burden[s]” voters.

162. The statute speaks for itself and does not require a response. Paragraph 162 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 162 and so deny them.

163. The statute speaks for itself and does not require a response. Paragraph 163 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 163 and so deny them.

164. The statute speaks for itself and does not require a response. Paragraph 164 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 164 and so deny them. The Republican Committees specifically deny that proponents of SB 1 sought to prohibit methods of voting for being “too convenient.”

165. The statute speaks for itself and does not require a response. Paragraph 165 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The

Republican Committees specifically deny that SB 1 makes it difficult to obtain assistance while voting in person.

166. The statute speaks for itself and does not require a response. Paragraph 166 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 166 and so deny them.

167. The statute speaks for itself and does not require a response. Paragraph 167 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

168. The statute speaks for itself and does not require a response. Paragraph 168 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

169. The statute speaks for itself and does not require a response. Paragraph 169 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees specifically deny that Texas has a “hyper-criminalized electoral system.”

170. The Republican Committees deny the allegations in Paragraph 170.

171. The Republican Committees deny the allegations in Paragraph 171.

172. The statute speaks for itself and does not require a response. Paragraph 172 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

173. The statute speaks for itself and does not require a response. Paragraph 173 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees deny that the referenced provisions “specifically target the early voting hours” used by “larger and more diverse counties.” The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 173 and so deny them.

174. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 174 and so deny them.

175. The statute speaks for itself and does not require a response. Paragraph 175 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 175 and so deny them.

176. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 176 and so deny them.

177. The statute speaks for itself and does not require a response. Paragraph 177 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 177 and so deny them.

178. The statute speaks for itself and does not require a response. Paragraph 178 states legal conclusions and/or statements of what the law provides or should provide, to which no

response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 178 and so deny them.

179. The statute speaks for itself and does not require a response. Paragraph 179 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 179 and so deny them. The Republican Committees specifically deny that SB 1 allows poll watchers to “intimidate voters.”

180. The statute speaks for itself and does not require a response. Paragraph 180 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

181. The statute speaks for itself and does not require a response. Paragraph 181 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

182. The statute speaks for itself and does not require a response. Paragraph 182 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

183. Paragraph 183 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 183 and so deny them.

184. The Republican Committees specifically deny that Texas “knowingly and directly invited voter intimidation.” The statute speaks for itself and does not require a response. Paragraph 184 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required; to the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 184 and so deny them.

185. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 185 and so deny them.

186. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 186 and so deny them.

187. Paragraph 187 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 187 and so deny them.

188. Paragraph 188 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 188 and so deny them.

189. Paragraph 189 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 189 and so deny them. The Republican Committees specifically deny that SB 1 “invite[s]” voter intimidation.

190. The Republican Committees deny the allegations in Paragraph 90.

191. Legislative history speaks for itself and does not require a response. Paragraph 191 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 191 and so deny them.

192. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 192 and so deny them.

193. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 193 and so deny them.

194. Paragraph 194 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 194 and so deny them.

195. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 195 and so deny them.

196. The Republican Committees deny the allegations in Paragraph 196.

197. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 197 and so deny them.

198. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 198 and so deny them.

199. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Paragraph 199 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 199 and so deny them.

200. The Republican Committees deny the allegations in Paragraph 200.

201. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 201 and so deny them.

202. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 202 and so deny them.

203. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 203 and so deny them.

204. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 204 and so deny them.

205. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history but deny that this history is relevant to SB 1 or that SB 1 was motivated



by racial discrimination. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 205 and so deny them.

206. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 206 and so deny them.

207. Census Bureau statistics speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 207 and so deny them.

208. Census Bureau statistics speak for themselves and do not require a response. To the extent a response is required, The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 208 and so deny them.

209. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 209 and so deny them.

210. The Republican Committees deny the allegations in Paragraph 210. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination.

211. The report issued by the U.S. Commission on Civil Rights and court decisions speak for themselves and do not require a response. Paragraph 211 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

212. Court decisions speak for themselves and do not require a response. Paragraph 212 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

213. Court decisions speak for themselves and do not require a response. Paragraph 213 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

214. Court decisions speak for themselves and do not require a response. Paragraph 214 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

215. The Republican Committees deny that Texas “suppress[es] minority political participation.” The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 215 and so deny them.

216. Paragraph 216 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 216 and so deny them.

217. Court decisions speak for themselves and do not require a response. Paragraph 217 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The

Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 217 and so deny them.

218. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 218 and so deny them.

219. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 219 and so deny them.

220. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 220 and so deny them.

221. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 221 and so deny them.

222. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 222 and so deny them.

223. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 223 and so deny them.

224. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 224 and so deny them.

225. The Republican Committees deny the allegations in paragraph 225.

226. Statements made by public officials and in political advertisements speak for themselves and do not require a response. The Republican Committees deny that Senator Cruz or his campaign used racial appeals.

227. The statements made in political advertisements speak for themselves and do not require a response. The Republican Committees deny that the Fort Bend County Republican Party used racial appeals.

228. The statements made by public officials and in political advertisements speak for themselves and do not require a response. The Republican Committees deny that Representative Sessions or his campaign used racial appeals.

229. Statements reported in media outlets speak for themselves and do not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 229 and so deny them.

230. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 230 and so deny them.

231. Statements made by public officials speak for themselves and do not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 231 and so deny them.

232. Statements made by public officials and in political advertisements speak for themselves and do not require a response. The Republican Committees deny that Senator Cornyn or his campaign used racial appeals.

233. Statements made by public officials speak for themselves and do not require a response. The Republican Committees deny that Senator Cornyn used racial appeals.

234. Statements made by political candidates speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 234 and so deny them.

235. Court decisions speak for themselves and do not require a response. Paragraph 235 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 235 and so deny them.

236. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 236 and so deny them.

237. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 237 and so deny them.

238. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 238 and so deny them.

239. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 239 and so deny them.

240. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 240 and so deny them.

241. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 241 and so deny them.

242. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 242 and so deny them.

## **COUNT I**

243. The Republican Committees incorporate their responses to the preceding paragraphs.

244. Court decisions and statutes speak for themselves and do not require a response. Paragraph 244 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

245. Court decisions speak for themselves and do not require a response. Paragraph 245 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

246. Paragraph 246 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees specifically deny that “a racially discriminatory purpose was a motivating factor in the passage of SB 1.” The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 246 and so deny them.

247. The Republican Committees deny the allegations in Paragraph 247.

248. The Republican Committees deny the allegations in Paragraph 248.

## **COUNT II**

249. The Republican Committees incorporate their responses to the preceding paragraphs.

250. The First and Fourteenth Amendments to the U.S. Constitution speak for themselves and do not require a response. Paragraph 250 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

251. Court decisions speak for themselves and do not require a response. Paragraph 251 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

252. Court decisions speak for themselves and do not require a response. Paragraph 252 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

253. The statute speaks for itself and does not require a response. Paragraph 253 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees specifically deny that SB 1 creates “burdens” or “obstacles” to vote or “[e]mpower[s]” or “encourage[s]” harassment or intimidation of voters.

254. The Republican Committees deny the allegations in Paragraph 254.

255. The Republican Committees deny the allegations in Paragraph 255.

256. The Republican Committees deny the allegations in Paragraph 256.

257. Paragraph 257 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 257 and so deny them. The Republican Committees specifically deny that SB 1 permits “intimidating behavior.”

258. The Republican Committees deny the allegations in Paragraph 258.

259. Court decisions speak for themselves and do not require a response. The Republican Committees deny that SB 1 “restrict[s] access to the franchise as a shield against

demographic and partisan changes.” Paragraph 259 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

260. The Republican Committees deny the allegations in Paragraph 260.

261. The Republican Committees deny the allegations in Paragraph 261.

262. The Republican Committees deny the allegations in Paragraph 262.

### **COUNT III**

263. The Republican Committees incorporate their responses to the preceding paragraphs.

264. The First Amendment of the U.S. Constitution and court decisions speak for themselves and do not require a response.

265. Court decisions speak for themselves and do not require a response. Paragraph 265 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

266. Court decisions speak for themselves and do not require a response. Paragraph 266 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

267. The statute speaks for itself and does not require a response. Paragraph 267 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

268. The statute speaks for itself and does not require a response. Paragraph 268 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.



269. The statute speaks for itself and does not require a response. Paragraph 269 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

270. Court decisions speak for themselves and do not require a response. Paragraph 270 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

271. Paragraph 271 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 271 and so deny them.

272. Paragraph 272 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 272 and so deny them.

273. Paragraph 273 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 273 and so deny them.

274. The Republican Committees deny that any provision of SB 1 violates the First Amendment. Paragraph 274 states legal conclusions and/or statements of what the law provides

or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 274 and so deny them.

275. The Republican Committees deny the allegations in Paragraph 275.

#### **COUNT IV**

276. The Republican Committees incorporate their responses to the preceding paragraphs.

277. Section 208 of the Voting Rights Act speaks for itself and does not require a response.

278. Legislative history speaks for itself and does not require a response. Paragraph 278 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

279. The statute and court decisions speak for themselves and do not require a response. Paragraph 279 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

280. The statute speaks for itself and does not require a response. Paragraph 280 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

281. Paragraph 281 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

282. The Republican Committees deny the allegations in Paragraph 282.

283. The Republican Committees deny the allegations in Paragraph 283.

### **PRAYER FOR RELIEF**

The Republican Committees deny that Plaintiffs are entitled to the relief requested.

### **AFFIRMATIVE AND OTHER DEFENSES**

Without assuming the burden of proof, and while reserving the right to assert all applicable affirmative defenses supported in law and fact, the Republican Committees assert the following affirmative defenses:

#### **FIRST AFFIRMATIVE DEFENSE**

The Court lacks subject matter jurisdiction over Plaintiffs' claims.

#### **SECOND AFFIRMATIVE DEFENSE**

The Complaint fails to allege sufficient facts upon which a claim for relief may be granted.

#### **THIRD AFFIRMATIVE DEFENSE**

Plaintiffs lack standing to assert their claims in the Complaint.

#### **FOURTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred by the applicable statutes of limitations.

#### **FIFTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred by the equitable doctrines of laches, estoppel, unclean hands, and/or waiver.

#### **SIXTH AFFIRMATIVE DEFENSE**

Plaintiffs have failed to join indispensable parties to this action.

**CONCLUSION**

The Republican Committees respectfully request that the Court (1) dismiss Plaintiffs' claims with prejudice and enter judgment for Defendants; (2) deny Plaintiffs' prayer for relief; and (3) grant other such relief as the Court may deem proper.

October 25, 2021

Respectfully submitted,

/s/ John M. Gore

John M. Gore

E. Stewart Crosland\*

Stephen J. Kenny\*

JONES DAY

51 Louisiana Avenue, N.W.

Washington, D.C. 20001

Phone: (202) 879-3939

Fax: (202) 626-1700

jmgore@jonesday.com

scrosland@jonesday.com

skenny@jonesday.com

*Counsel for Proposed Intervenor-Defendants*

*\*Pro hac vice applications forthcoming*